

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CHARLIE JAVICE, OLIVIER AMAR,)	
CHARLIE JAVICE, in her capacity as Trustee)	
of CHARLIE JAVICE 2021 IRREVOCABLE)	C.A. No. 22-01621-MN
TRUST #1, CHARLIE JAVICE, in her)	
capacity as Trustee of CHARLIE JAVICE)	
2021 IRREVOCABLE TRUST #2, and)	
CHARLIE JAVICE in her capacity as Trustee)	
of CHARLIE JAVICE 2021 IRREVOCABLE)	
TRUST #3,)	
)	
Defendants.)	

DECLARATION OF TIBOR L. NAGY, JR.

I, TIBOR L. NAGY, JR., declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly admitted to practice in the States of New York, New Jersey, and Texas, and my admission *pro hac vice* to practice before the District of Delaware in the above captioned action is pending. I submit this Declaration in support of JPMorgan Chase Bank, N.A.’s (“JPMC”) contemporaneously filed Motion to Dismiss and Compel Arbitration of Charlie Javice’s Counterclaims, or Alternatively to Stay Counterclaims in Favor of Arbitration.

2. I am a partner at Dontzin Nagy & Fleissig LLP, and I represent JPMC in the above-captioned action. As such, I am familiar with the facts set forth herein and the documents attached hereto.

3. Attached as Exhibit A is a true and correct copy of the Offer and Retention Agreement, executed on August 4, 2021, between JPMC and Charlie Javice.

4. Attached as Exhibit B is a true and correct copy of the Amended and Restated Payment Direction Agreement, dated September 14, 2021, by and among Ms. Javice, TAPD, Inc. d/b/a Frank, and JPMC.

5. Attached as Exhibit C is a true and correct copy of the formal notice of termination from JPMC to Ms. Javice, dated November 4, 2022.

6. Attached as Exhibit D is a true and correct copy of a letter from JPMC to Ms. Javice, dated November 22, 2022, regarding “Notice of Cancellation and Demand of Repayment.”

7. Attached as Exhibit E is a true and correct copy of the JPMorgan Chase & Co. Long-Term Incentive Plan Terms and Conditions for Restricted Stock Unit Award, dated as of January 19, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 20, 2023

/s/ Tibor L. Nagy, Jr. _____

Tibor L. Nagy, Jr.